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Attorneys for Plaintiff Federal Deposit

Insurance Corporation as Receiver

for Washington Mutual Bank

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

FEDERAL DEPOSIT INSURANCE  
CORPORATION AS RECEIVER FOR  
WASHINGTON MUTUAL BANK,

Plaintiff,

vs.

FREEDOM MORTGAGE  
CORPORATION,

Defendant,

Case No. 8:23-cv-01359-FWS-KES

**JOINT STIPULATION TO DISMISS  
CASE WITH PREJUDICE**

[PROPOSED] ORDER FILED  
CONCURRENTLY

1 Plaintiff Federal Deposit Insurance Corporation as Receiver for Washington  
2 Mutual Bank (the “FDIC-R”) and Defendant Freedom Mortgage Corporation  
3 (collectively, the “Parties”) hereby stipulate pursuant to Federal Rule of Civil  
4 Procedure 41(a)(1)(A)(ii), that this action be dismissed with prejudice as to all claims,  
5 cause of actions, and parties, with each party bearing that party’s own attorney’s fees  
6 and costs.

7 Respectfully submitted,

8  
9 DATED: August 20, 2025

MORTGAGE RECOVERY LAW GROUP, LLP

10  
11 By: /s/ Michael H. Delbick

Michael H. Delbick

12 Attorneys for Plaintiff Federal Deposit Insurance  
13 Corporation as Receiver for Washington Mutual  
14 Bank

15 DATED: August 20, 2025

BILZIN SUMBERG BAENA PRICE &  
AXELROD LLP

16  
17 By: /s/ Philip Stein

Philip Stein

18 Attorneys for Defendant Freedom Mortgage  
19 Corporation

20 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attests that all other  
21 signatories listed, and on whose behalf this filing is submitted, concur in the filing’s  
22 content and have authorized the filing.

23  
24 By: /s/ Michael H. Delbick

Michael H. Delbick